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APR 0 6 2023

LAURA A AUSTIN, CLERK

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF VIRGINIA ROANOKE DIVISION

UNITED STATES OF AMERICA)	Case No. 7123CL60020
v.)	SEALED INDICTMENT
SHANNON MARIE MARRON KEARNS))	In violation of: Title 18 U.S.C. §§ 922(a)(6), 924(a)(2)

COUNT ONE

The Grand Jury charges that:

- 1. On or about May 11, 2018, in the Western District of Virginia, the defendant, SHANNON MARIE MARRON KEARNS, in connection with the acquisition of a firearm, a Ruger, model LC9S, 9mm semi-automatic pistol, from Virginia Gun and Knife Traders, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Virginia Gun and Knife Traders, which statement was intended and likely to deceive Virginia Gun and Knife Traders, as to a fact material to the lawfulness of such sale of said firearm to the defendant under Chapter 44 of Title 18, United States Code, in that the defendant did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that defendant SHANNON MARIE MARRON KEARNS was the actual buyer of the firearm, when in fact as the defendant then knew she was not the actual buyer of the firearm.
 - 2. All in violation of Title 18, United States Code, 922(a)(6) and 924(a)(2).

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A **TRUE BILL**, this _____ day of April, 2023.

Christopher R. Kavanaugh

United States Attorney

s/Grand Jury Foreperson FOREPERSON